

IN THE UNITED STATE BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In Re: §  
§ Case No.: 09-38264-hdh13  
LIF ESMAEL MODABBERI, §  
§ (Chapter 13)  
Debtor, §

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DALLAS UNLIMITED REAL ESTATE §  
SOLUTIONS, INC., PROMPT §  
PROFESSIONAL REAL ESTATE §  
SERVICES, INC. and LIF MODABBERI §  
§  
Plaintiffs, §  
v. § ADVERSARY NO. 09-03456-hdh13  
§  
FIRST STATE BANK, MESQUITE § Removed from County Court at Law  
§ No. 1 for Dallas County, Texas  
§ Cause No. CC-09-03970-A  
Defendant, §

**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that a hearing on Plaintiffs' Motion to Remand will be held on February 16, 2010 at 1:30 p.m. (CDT), before the Honorable Harlin D. Hale, U.S. Bankruptcy Court, 1100 Commerce Street, 14<sup>th</sup> Floor, Dallas, Texas 75242., in relation to Adversary Proceeding No. 09-03456-hdh.

Respectfully submitted,

**PAYMA, KUHNEL & SMITH, P.C.**  
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/s/ Michael D. Payma  
Michael D. Payma  
TSBN: 00790560

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of January, 2010, a true and correct copy of the foregoing document has been served on the following by the method indicated:

Gregory Noschese  
Munch Hardt Kopf & Haar, P.C.  
3800 Lincoln Plaza  
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Dallas, Texas 75201-6659  
**Via Facsimile (214) 855-7584 and  
Hand Delivery**

Thomas Powers  
Bankruptcy Trustee  
125 E. John Carpenter Freeway, Suite 1100  
Irving, Texas 75062-2288  
**Via C.M.R.R.R.**

/s/ Michael D. Payma  
Michael D. Payma